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In the Matter of: Bessie M. Smith Debtor(s)	UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Case No. 17-16355-SLM Chapter 13

**OBJECTION TO MOTION TO AVOID LIENS OF PUBLIC SERVICE
ELECTRIC & GAS COMPANY AND PORTFOLIO RECOVERY ASSOCIATES
PURSUANT TO 11 U.S.C. § 506(a)(1) & 506(d) AND RECLASSIFYING CLAIMS
FROM SECURED TO COMPLETELY UNSECURED**

NOW COMES Creditor PSE&G Company to object to the Motion to Avoid

Liens proposed by debtor for the following reasons:

1. PSE&G judgment filed on October 31, 2016 has priority over the first mortgage that was dated May 24, 2017;
2. The amount of the PSE&G judgment can be fully funded from the value of the Debtor's property;
3. As such, PSE&G judgment lien is fully secured by the existing real estate value.

WHEREFORE, PSE&G Company moves the Court to deny Debtor's Motion to Avoid Liens.

/s/ Vilna Waldron Gaston

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CERTIFICATE OF SERVICE

1. I, Robert Gardinor, am the paralegal for Vilna Waldron Gaston, who represents, PSE&G Company in this matter.
2. On October 22, 2019, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below.
 - i. Objection to Debtor's Motion to Avoid Liens
 - ii. Certificate of Service
3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Date: October 22, 2019

/s/ Robert Gardinor _____
Signature